

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

CORNELL MONTEZ CHANDLER,

Defendant.

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Case No: 23-CR-367(1) (JMB/JFD)

**MOTION TO MODIFY  
CONDITIONS OF RELEASE**

COMES NOW Defendant, CORNELL MONTEZ CHANDLER, by and through the undersigned counsel, and pursuant to 18 U.S.C. § 3142(c)(3), hereby moves the Court to modify the Order Setting Conditions of Release (ECF. 59) to allow the defendant to leave the Duluth Bethel hallway house in Duluth, Minnesota where he currently resides on June 17, 2024 at 6:00 p.m. so that he may travel from Duluth to St. Paul, Minnesota and appear for his change of plea hearing before the Honorable Jeffrey M. Bryan, Judge of United States District Court, on June 18, 2024 at 2:00 p.m. Defendant would intend to spend the evening of June 17, 2024, at the home of his children's mother, Tatiana Wade, in St. Paul, Minnesota. Defendant has arranged for transportation from Duluth to St. Paul, Minnesota but the person who will transport him is only available to do so on the evening of June 17, 2024.

Defendant does not have any other means available to him to travel from Duluth to St. Paul to attend his change of plea hearing.

He therefore requests that the conditions of his release be modified to allow him to leave the halfway house on June 17, 2024 at 6:00 p.m., travel directly to the home of Tatiana Wade in St. Paul, Minnesota, and remain there until such time as he must leave to appear at the United States Courthouse in St. Paul, Minnesota on June 18, 2024, at 2:00 p.m. A proposed Order accompanies this motion.

Respectfully submitted,

DATED: June 13, 2024

GOETZ & ECKLAND P.A.

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